

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DANA UNDIES, INC., individually and on  
behalf of itself and all others similarly situated,

v.

COATS PLC; et al.

Civil Action No.  
07-CIV-10340 (DC)

**STIPULATION OF EXTENSION OF TIME TO RESPOND TO  
CLASS ACTION COMPLAINT**

COME NOW Plaintiff and Defendants, William Prym GmbH & Co. KG, Prym Consumer USA, Inc., Prym Fashion, Inc., YKK Corporation of America Inc., YKK (U.S.A.) Inc., YKK Snap Fasteners America, Inc., Coats plc, Coats North America de Republica Dominicana, Inc., and Scovill Fasteners Inc ("Defendants"), in the above-styled civil action, and by and through their undersigned counsel, hereby stipulate that the time within which the Defendants must file a response to the Class Action Complaint is hereby extended until 45 days after: (1) the Panel on Multidistrict Litigation rules on the pending motions and (2) Plaintiff files and serves a consolidated class action complaint. If any answer or other responsive pleading is filed by Defendants in any other action arising out of the same transactions and occurrences before the date required by this stipulation, or if any documents are produced in such action, Defendants will file their answer or responsive pleading, and shall produce such documents, in this matter concurrently. In no event shall the Defendants' time to respond to the class action complaint or a consolidated class action complaint, if any, be due prior to the time that a response is due for any defendant that is not a party to this stipulation, except that not more than 30 days shall thereby be added to the time that Defendants would otherwise be required to respond pursuant to this stipulation.

By entering into this stipulation, Defendants have not waived their rights with respect to any potential defenses in this litigation, including but not limited to assertion of jurisdictional defenses, except as to the sufficiency of service of process.

So stipulated, this 15th day of January, 2008.

LIEF, CABRASER, HEIMANN & BERNSTEIN,  
LLP

780 Third Avenue, 48th Floor  
New York, NY 10017  
(212) 355-9500  
dstellings@lchb.com

By: 

David S. Stellings (DSS 5343)

*Attorneys for Plaintiff*

Joseph F. Wayland  
SIMPSON THACHER & BARTLETT LLP  
425 Lexington Avenue  
New York, NY 10017  
(212) 455-2000  
jwayland@stblaw.com

By: 

Joseph F. Wayland (JW 7549)

*Attorneys for Defendants Coats plc, and Coats  
North America de Republica Dominicana, Inc.*

Scott Martin  
WEIL, GOTTSAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
(212) 310-8000  
scott.martin@weil.com

By: 

Scott Martin (SM 7373)

*Attorneys for Defendants William Prym GmbH &  
Co. KG, Prym Consumer USA, Inc., and Prym  
Fashion, Inc..*

John Shin  
MORGAN LEWIS & BOCKIUS LLP  
101 Park Avenue  
New York, NY 10178  
(212) 309-6844  
jshin@morgandlewis.com

By: \_\_\_\_\_

John Shin (JS 1970)

*Attorneys for Defendants YKK Corporation of  
America Inc., YKK (U.S.A.) Inc., and YKK Snap  
Fasteners America, Inc.*

So stipulated, this 15th day of January, 2008.

LIEF, CABRASER, HEIMANN & BERNSTEIN,  
LLP

780 Third Avenue, 48th Floor  
New York, NY 10017  
(212) 355-9500  
dstellings@lehb.com

By: 

David S. Stellings (DSB 5343)

*Attorneys for Plaintiff*

Joseph F. Wayland  
SIMPSON TEACHER & BARTLETT LLP  
425 Lexington Avenue  
New York, NY 10017  
(212) 455-2000  
jwayland@stblaw.com

By: \_\_\_\_\_

Joseph F. Wayland (JW 7549)

*Attorneys for Defendants Coats plc, and Coats  
North America de Republica Dominicana, Inc.*

Scott Martin  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
(212) 310-8000  
scott.martin@weil.com

By: \_\_\_\_\_

Scott Martin (SM 7373)

*Attorneys for Defendants William Prym GmbH &  
Co. KG, Prym Consumer USA, Inc., and Prym  
Fashion, Inc.,*

John Shin  
MORGAN LEWIS & BOCKIUS LLP  
101 Park Avenue  
New York, NY 10178  
(212) 309-6844  
jshin@morganlewis.com

By: 

John Shin (JS 1970)

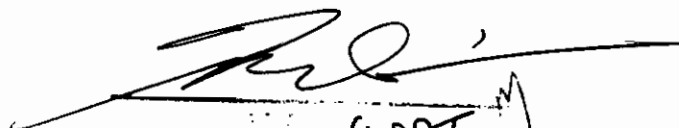
*Attorneys for Defendants YKK Corporation of  
America Inc., YKK (U.S.A.) Inc., and YKK Snap  
Fasteners America, Inc.*

John G. Desprist  
SMITH, GAMERELL & RUSSELL, LLP  
1230 Peachtree Street, NE  
Promenade II, Suite 3100  
Atlanta, Georgia 30309-3592  
(404) 815-3500  
jdesprist@sgrlaw.com

By:   
John G. Desprist  
(Pro Hac Vice Application to be  
Submitted)

*Attorneys for Defendant Scovill Fasteners, Inc.*

SO ORDERED.

  
WDS  
1/23/08